

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

KIMBRA CRISWELL,	)	
	)	
Plaintiff,	)	
v.	)	C.A. No. 05-CV-00321 GMS
	)	
LYDIA ADAIR MCFADDEN and CHRISTIANA	)	
CARE HEALTH SERVICES, INC.,	)	JURY TRIAL DEMANDED
	)	
Defendants.	)	

**NOTICE OF RECORDS DEPOSITION**

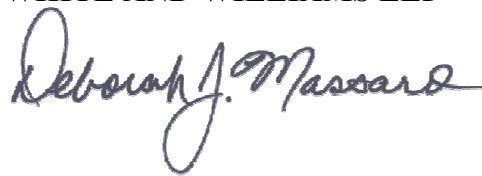
**PLEASE TAKE NOTICE** that the undersigned attorney will take the records deposition of **Dr. Andrew J. Gelman** on **September 5, 2006** beginning at 10:00 a.m. in the offices of **WHITE and WILLIAMS LLP**, 824 North Market Street, Suite 902, Wilmington, Delaware 19801.

**Duces Tecum:**

**Produce a complete copy of all medical records, including but not limited to all in-patient and out-patient from date of initial treatment to the present relating to Kimbra Criswell.**

**Note: *Personal appearance has been waived if the requested records and affidavit of substitute compliance are received in this office prior to the date of the scheduled deposition.***

WHITE AND WILLIAMS LLP



By:

---

**DEBORAH MASSARO, ESQUIRE**

824 Market Street, Suite 902

P.O. Box 709

Wilmington, DE 19899

(302) 654-0424

*Attorney for Defendants,*

*Lydia Adair McFadden*

*and Christiana Care Health Services, Inc.*

Date: August 22, 2006

**CERTIFICATE OF SERVICE**

I, Deborah Massaro, Esquire, certify that on this 22<sup>nd</sup> day of August, 2006, two copies of the foregoing **NOTICE OF RECORDS DEPOSITION** was delivered by regular U.S. mail, postage prepaid, to the following individuals:

Nelson Levin, Esquire  
Michael T. Van Der Veen, Esquire  
Kats, Jamison, van der Veen & Associates  
25 Bustleton Pike  
Feasterville, PA 17044

Daniel W. Scialpi, Esquire  
Richard R. Wier, Jr., Esquire  
Law Offices of Richard R. Wier, Jr., P.A.  
Two Mill Road  
Suite 200  
Wilmington, DE 19806

**WHITE AND WILLIAMS LLP**



By:

**DEBORAH MASSARO, ESQUIRE**  
824 Market Street, Suite 902  
P.O. Box 709  
Wilmington, DE 19899  
(302) 654-0424  
*Attorney for Defendants,  
Lydia Adair McFadden  
and Christiana Care Health Services, Inc.*